CANDIS MITCHELL
California Bar No. 242797
FEDERAL DEFENDERS OF SAN DIEGO, INC.
225 Broadway, Suite 900
San Diego, California 92101-5008
Telephone: (619) 234-8467
Candis_Mitchell@fd.org

Attorneys for Mr. Jaime Lizarraga-Lopez

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA, Plaintiff, v. **JAIME LIZARRAGA-LOPEZ**, Defendant.	CASE NO.: 08cr0477-BEN DATE: APRIL 18, 2008 TIME: 2:00 P.M. NOTICE OF MOTIONS AND MOTIONS TO: 1) COMPEL DISCOVERY AND PRESERVE EVIDENCE; 2) SUPPRESS ANY STATEMENTS MADE BY MR. LIZARRAGA-LOPEZ; AND, 3) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, INTERIM UNITED STATES ATTORNEY, AND
JEFFREY D. MOORE, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on April 18, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, defendant, Jaime Lizarraga-Lopez, by and through his attorneys, Candis Mitchell and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

/ / /

/ / /

/ / /

MOTIONS

Defendant, Jaime Lizarraga-Lopez, by and through his attorneys, Candis Mitchell and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Compel Discovery and Preserve Evidence;

(2) Suppress any Statements Made by Mr. Lizarraga-Lopez; and

(3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: April 14, 2008

s/ Candis Mitchell
CANDIS MITCHELL
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Lizarraga-Lopez
Candis_Mitchell@fd.org